

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 3:15-cr-00037-2</b>
	)	<b>Judge Trauger</b>
<b>BENJAMIN BRADLEY,</b>	)	
	)	
<b>Defendant.</b>	)	
	)	

**MOTION TO CONTINUE SENTENCING HEARING**

Counsel for the United States has recently received service of the sealed sentencing memorandum filed on January 24, 2017 by Defendant Benjamin Bradley. (DE# 842, Sealed Document.) That memorandum is 52 pages long, excluding certificates and attached exhibits. In it, Bradley raises various allegations sounding in prosecutorial misconduct, including that the government: manipulated the indictment by charging money laundering; violated its duty of candor by excluding from co-defendants' plea agreements certain facts that they had admitted during their proffers; and "arbitrarily chose[] to treat the defendants in [this] case more harshly than those in prior cases." In addition, Bradley raises a number of constitutional challenges to the methods and legal standards that apply when calculating the applicable guidelines range.

In order to have time to adequately respond to these allegations and arguments, the United States respectfully requests that the sentencing hearing in this case—currently scheduled for February 1, 2017—be continued to on or after February 8, 2017.

Respectfully submitted,

DAVID RIVERA  
United States Attorney for the  
Middle District of Tennessee

*s/ Cecil W. VanDevender*

Cecil W. VanDevender

Assistant United States Attorney

110 9<sup>th</sup> Avenue South, Suite A-961

Nashville, Tennessee 37203

615-736-5151

**CERTIFICATE OF SERVICE**

I hereby certify that on January 25, 2017, I sent a copy of the foregoing via the Court's electronic filing system to counsel for Defendant Benjamin Bradley.

*s/ Cecil VanDevender*

CECIL VANDEVENDER